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Attorney for Material Witnesses

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
(Magistrate Judge McCurine, Jr.)

UNITED STATES OF AMERICA;)	Criminal Case No: 08cr0972
)	Magistrate Case No. 08mj0942
Plaintiff,)	
vs.)	MOTION FOR MATERIAL
)	WITNESSES' VIDEOTAPED
)	DEPOSITION
RAMON VASQUEZ-CABRALES, et al.)	DATE: April 29, 2008
)	TIME: 10:30 am
Defendant.)	HON: William McCurine, Jr.
)	
)	

TO UNITED STATES ATTORNEY KAREN P. HEWITT OR HER REPRESENTATIVE, TO
ATTORNEY, FEDERAL DEFENDERS FOR DEFENDANT (name of defendant): NOTICE IS HEREBY
GIVEN that on April 29, 2008 at 10:30 am, or as soon thereafter as the matter may be heard, in the
courtroom of Honorable William McCurine, Jr. of this court, located at 940 Front Street, San Diego,
California 92101, Material Witnesses Eduardo Reyes-Rodriguez and Ramon Torres-Silva by and through
their attorney of record, Linda A. King, will move the court for an order authorizing the videotaped
deposition of the material witnesses.

1 The motion will be made on the ground that there is good cause for the order requested in that the
2 material witnesses know of no sureties in this country who will bond them out of US Marshall's Custody
3 during the pendency of this matter. Neither the interests of justice nor the convenience of the parties and
4 witnesses will be served by requiring the material witnesses to remain in Marshall's Custody until the
5 matter is concluded.

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8 Date: April 10, 2008

9 S/Linda A. King
10 Linda A. King
11 Attorney for Material Witness(es)
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